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6 Attorneys for Defendant
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7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,) Case No. 2:20-cr-00228-JAM-1
)
12 Plaintiff,) STIPULATION AND ORDER TO
) CONTINUE STATUS CONFERENCE AND
13 vs.) EXCLUDE TIME
)
14 RICARDO DURAN,) Date: April 27, 2021
) Time: 9:30 a.m.
15 Defendant.) Judge Hon. John A. Mendez
)
16 _____)

17 IT IS HEREBY STIPULATED by and between Phillip A. Talbert, Acting United States
18 Attorney, through Alexis Nelsen, Assistant United States Attorney, counsel for Plaintiff
19 (hereinafter “the government”) and Heather Williams, Federal Defender, through Assistant
20 Federal Defender Lexi Negin, counsel for Defendant Ricardo Duran (hereinafter “defense
21 counsel”), **that the status conference scheduled for April 27, 2021 may be vacated and**
22 **continued to June 1, 2021 at 9:30 a.m.**

23 Defense counsel represents that she requires additional time to review discovery, conduct
24 further legal research; meet with her client to discuss potential resolution; and otherwise prepare
25 for trial. Defense counsel believes that failure to grant the requested continuance would deny Mr.
26 Duran the reasonable time necessary for effective preparation, taking into account the exercise of
27 due diligence. The government does not object to the continuance.
28

1 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
2 excluded through and including June 1, 2021; pursuant to 18 U.S.C. §3161(h)(7)(A) and (B)(iv)
3 [reasonable time to prepare] and General Order 479, Local Code T4 based upon defense
4 preparation.

5 Respectfully submitted,

6 HEATHER E. WILLIAMS
7 Federal Defender

8 Date: April 22, 2021

/s/ Lexi Negin
9 LEXI NEGIN
Assistant Federal Defender
Attorneys for Defendant
10 RICARDO DURAN

11 Date: April 22, 2021

12 PHILLIP A. TALBERT
Acting United States Attorney

13 /s/ Alexis Nelsen
14 ALEXIS NELSEN
Assistant United States Attorney
15 Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

The Court orders the time excluded from April 27, 2021 through June 1, 2021 from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for defense counsel to prepare] and General Order 479, (Local Code T4). The Court finds the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial. It is further ordered the April 27, 2021 status conference shall be continued until June 1, 2021, at 9:30 a.m. before Honorable John A. Mendez.

IT IS SO ORDERED.

DATED: April 22, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE